

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed August 5, 2008. At the time of the Office Action, Claims 1-16 were pending in the Application. Claims 1-16 were rejected. Applicants hereby cancel Claims 1-16 without prejudice or disclaimer and add new Claims 17-36. Applicants respectfully request reconsideration and favorable action in this case.

Information Disclosure Statement

The Office Action states that the Information Disclosure Statement filed April 29, 2008 fails to comply with the provisions of 37 C.F.R. §§ 1.97 and 1.98 and M.P.E.P. § 609. Applicants apologize for this oversight, and are resubmitting the Information Disclosure Statement concurrent with this response. However, because the Office Action is non-final, Applicants believe the Information Disclosure Statement need only comply with 37 C.F.R. § 1.97(c), not 37 C.F.R. § 1.97(d) as suggested by the Office Action.

Section 102 Rejections

Claims 1-16 were rejected in the Office Action under 35 U.S.C. § 102(b) as being anticipated by "Converting PC GUIs for NonPC Devices" by Dan Johnson ("*Johnson*"). Although Claims 1-16 have been canceled, Applicants submitted that newly added Claims 17-36 are allowable over the cited reference.

In order to establish a prima facie case of anticipation, all the elements of the claimed invention must be found within a single prior art reference. *Dewey & Almy Chemical Co. v. Mimex*, 124 F.2d 986, 52 USPQ 138 (2d Cir. 1942). Applicant respectfully submits that all the element of Claims 17-36 are not found within the *Johnson* reference.

Claim 17 recites:

A method for dynamically constructing a web page,
comprising:

receiving a request for a webpage identified by a URL
and defined by a plurality of GUI nodes stored in a page
registry;

receiving a user identifier representing a user associated
with the request;

identifying, based on the user identifier, a subset of the
plurality of GUI nodes that the user is authorized to access;

retrieving the subset of GUI nodes the user is authorized to access;
determining a data representation specification associated with the user, the data representation specification specifying one or more data formats appropriate for the user;
converting the subset of GUI nodes the user is authorized to access into a script conforming to the data representation specification associated with the user; and
transmitting the script to the user.

Applicants submit that *Johnson* fails to teach, suggest, or disclose all of these elements. For example, *Johnson* fails to teach, suggest, or disclose “receiving a request for a webpage . . . defined by a plurality of GUI nodes stored in a page registry.” Instead, *Johnson* merely discloses using “client components . . . to retrieve content from the Web” and that the components “include support for images (GIF, JPEG), HTML, HTTP, FTP, and other Web client technologies.” *Johnson*, p. 44, col. 2, ll. 16-20. *Johnson* fails to teach, suggest, or disclose that the content is defined by a plurality of GUI nodes stored in a page registry. Because of this, *Johnson* also fails to teach, suggest, or disclose “identifying, based on the user identifier, a subset of the plurality of GUI nodes that the user is authorized to access,” “retrieving the subset of GUI nodes the user is authorized to access,” and “converting the subset of GUI nodes the user is authorized to access into a script conforming to the data representation specification associated with the user.” For at least these reasons, Applicants submit that Claim 17 is allowable over *Johnson*.

Similar to Claim 17, Claim 24 recites logic embodied in a computer-readable medium operable, which executed by a computer processor, to perform the steps comprising: “receiving a request for a webpage identified by a URL and defined by a plurality of GUI nodes stored in a page registry,” “identifying, based on the user identifier, a subset of the plurality of GUI nodes that the user is authorized to access,” “retrieving the subset of GUI nodes the user is authorized to access,” and “converting the subset of GUI nodes the user is authorized to access into a script conforming to the data representation specification associated with the user.” Therefore, Applicants submit that Claim 24 is allowable over *Johnson*, for example, for reasons similar to those discussed above with regard to Claim 17.

Likewise, Claim 31 recites “a GUI data manager operable to: receive a request for a webpage . . . defined by a plurality of GUI nodes stored in a page registry,” “identify, based on the user identifier, a subset of the plurality of GUI nodes that the user is authorized to

access,” “retrieve the subset of GUI nodes the user is authorized to access,” and “convert the subset of GUI nodes the user is authorized to access into a script conforming to the data representation specification associated with the user.” Therefore, Applicants submit that Claim 31 is allowable over *Johnson*, for example, for reasons similar to those discussed above with regard to Claims 17 and 24.

Claims 18-23, 25-30, and 32-36 depend from Claims 17, 24, and 31, respectively. Therefore, Applicants submit that Claims 18-23, 25-30, and 32-36 are allowable over *Johnson*, for example, for reasons similar to those discussed above with regard to Claims 17, 24, and 31.

Moreover, *Johnson* fails to teach, suggest, or disclose several additional limitations recited by the dependent claims depending from Claims 17, 24, and 31. For example, Claims 19, 26, and 35 recite the additional limitation that “the GUI nodes comprise XML files.” Similarly, Claims 20, 27, and 36 recite the additional limitation that “the subset of GUI nodes comprise disparate XML formats” and “conver[ting] the subset of GUI nodes into a common XML format.” *Johnson* fails to teach, suggest, or disclose these limitations. In fact, *Johnson* makes no mention of XML files. For these additional reasons, Applicants submit that Claims 19, 20, 26, 27, 35, and 36 are also allowable over *Johnson*.

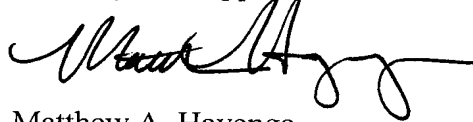
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons readily apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any deficiency or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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